

FILED
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2005 FEB -1

A.U. 30
CIVIL ACTION NO. 04-CV-12169-REK

ANN MITCHELL,
Plaintiff
*
*
v. *
*
HALLMARK HEALTH SYSTEMS/ *
LAWRENCE MEMORIAL HOSPITAL *
JULIE CHASE SHAUGHNESSY *
Defendants *

U.S. DISTRICT COURT
DISTRICT OF MASS.

**PLAINTIFF'S ASSENTED TO MOTION TO EXTEND THE TIME TO FILE HER
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS
AMENDED COMPLAINT COUNTS II-X**

Plaintiff, Ann Mitchell, hereby moves that this Honorable Court extend the time by which Plaintiff must file her opposition to Defendants' Motion to Dismiss Compliant Counts II Through XI from January 31, 2005 to and including February 6, 2005. As reasons therefore, Plaintiff states that Plaintiff's counsel has been unable to complete Plaintiff's opposition due to lost time at work due to the blizzard, the resulting three day school cancellation, and a back injury counsel suffered as a result of the storm.

Wherefore, Plaintiff respectfully requests that this motion be allowed.

January 28, 2005

Assented To:

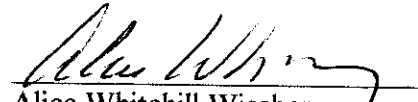
John Simon (Aww)
Macon P. Magee, Esq.
John Simon, Esq.

Respectfully submitted,
ANN MITCHELL
By Her Attorney,

Alice Whitehill Wiseberg
Alice Whitehill Wiseberg
65A Atlantic Avenue, 3rd Floor
Boston, MA 02110
(617) 304-3848
BBO# 568027

Certification Pursuant to Local Rule 7.1(A)(2)

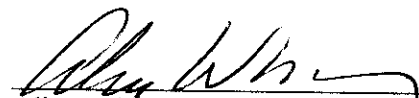
I hereby certify, pursuant to Local Rule 7.1(A)(2) that on January 28, 2005 I contacted Defendants counsel, John Simon, by telephone and discussed in a reasonable and good faith effort to resolve and or narrow the issues addressed in this motion.


Alice Whitehill Wiseberg

Certificate of Service

I, Alice Whitehill Wiseberg, Esq., hereby certify that on this date a true copy of the above document was served upon the attorney of record for each other party by facsimile and first-class mail, postage prepaid.

January 28, 2005


Alice Whitehill Wiseberg